Sanitized Copy Approved for Release 2010/05/17: CIA-RDP89-00244R001002480004-8

Ger Sanitized Copy Approved for Release 2010/05/17 : CIA-RDP89-00244R001002480004-8
National Capital Region
Washington, DC 20407

December 13, 1985

Smith, Hinchman & Grylls Associates, Inc. 455 West Fort Street Detroit, Michigan 48226

Attention: W. Everett Medling

Subject: GS-11B-19068, Bid Package No. 1, Site, Foundation, and

Parking Deck, CIA Headquarters Expansion, Langley,

Virginia, Appeal of The George Hyman Construction Company,

Caisson Dispute, GSBCA No. 7913

Gentlemen:

Reference is made to the attached letter from our GSA trial council relative to the above subject.

The attached letter is self-explanatory and the purpose of my letter is to suggest the following method of providing compensation for the "third party" witnesses and/or technical assistance required by our Mr. Harrington.

For SH&G employees and SH&G's consultants:

- 1. After the required services have been provided and the appropriate fees, rates and other cost items have been discussed/negotiated with the writer, all invoices are to be forwarded to this office for endorsement.
- 2. This office will present the approved invoices to the CIA for payment.
- 3. SH&G will then be reimbursed for all services provided, including those services provided by the two consultants, through the professional services contract.
- 4. SH&G will make the appropriate payments to (Stoll, Evans, Wood & Associates) and to (Dames & Moore).

Your cooperation in this matter is greatly appreciated. Please call if there are any questions with the above.

Sincerely,

Project Manager

Headquarters Expansion Project

AJC:nj

Attachment: LCA Ltr.

rvices

General Counsel

administration Counsel Washington,

20405

OCT 30 1965

Trial Counsel - LCA

GSBCA No. 7913 - Appeal of THE GEORGE HYMAN CONSTRUCTION COMPANY Contract No. GS-11B-19068

Frank A. Mallalieu - WPPC

MPCTE

Me CARLUEOI

Nec Action

AES

11.4.85

Reference is made to our conversation of October 28, 1985, concerning prospective third party witnesses required for the preparation and participation in the hearing for the above appeal.

Please enter into appropriate agreements with the following third party project persons to provide litigation support services for the time stated:

William Everett Medling - 48 hours Nalasco Angeles - 48 hours c/o Smith, Hinchman & Grylls Associates 455 West Fort Street Detroit, MI 48226 Telephone No: (313) 964-3000

Ulrich Stoll - 32 hours c/o Stoll, Evans, Wood & Associates 111 West Kingsley Street Ann Arbor, MI 48013 Telephone No: (313) 994-5055

John Kittridge - 8 hours
Raymond R. Fox - 24 hours
Richard C. Tucker - 4 hours
c/o Dames & Moore
7101 Wisconsin Avenue, Suite 700
Bethesda, MD 20814
Telephone No: (301) 652-2215

Dan Knotts - 12 hours c/o Construction Environment Inc. (CEI) 5655 General Washington Drive Alexandria, VA 22312

The services to be performed may include any or all of the following:

 Assisting counsel by answering and/or propounding interrogatories, as requested by counsel. 2

- Assisting counsel in deposing witnesses by providing recommended lines of technical inquiry, in writing or otherwise, and/or by attendance at any such depositions, as requested by counsel.
- 3. Attending, and/or preparing for, trial strategy meetings with counsel and/or other Government witnesses, as requested by counsel.
- 4. Attending, and furnishing testimony at trial, and attending those sessions with counsel as deemed necessary for the preparation of that testimony, as requested by counsel.
- 5. Furnishing technical assistance to counsel at trial, other than through direct testimony above, by providing technical assistance relating to the testimony of witnesses, as requested by counsel.
- Furnishing for trial, graphs, charts, and/or other demonstrative evidence as requested by counsel.
- Furnishing any other litigation related assistance, as requested by counsel.

In addition, services of an expert witness may be required. We are in the process of locating one at this time, and will advise you when we have done so.

You should be aware that we expect the hearing to commence on January 22, 1986, in Washington, DC, and will last approximately three days. It is anticipated that travel and related hotel accommodations, as provided by Federal regulatons, may be required for some of the witnesses and should be included in the purchase order. Actual "travel time" shall not be reimbursable as part of any negotiated hourly fee.

Thank you for your assistance with this appeal.

LAURENCE CHARRINGTON

Trial Counsel

Claims and Litigation Division